

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

JOHN N. CASTELLANO, III

Plaintiff,

v.

VERNON BETTS, et al.,

Defendants.

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Case No. 4:19-CV-02304-SRC

**AFFIDAVIT OF JOHN N. CASTELLANO, III**

COMES NOW Affiant, John N. Castellano, III., being duly sworn and upon his oath states as follows:

1. I am over the age of 18 and under no legal disability.
2. I have personal knowledge of the facts set forth herein.
3. I am a POST certified generalist instructor, which means I am certified to teach general law enforcement classes. I have been a generalist instructor since about 2008 and have been teaching new hires and deputies on topics requested by the Sheriff's Department, such as sexual harassment and courtroom procedures, since I became POST certified.
4. I am also certified to teach active shooter training, which is a specialized training, and have provided this training to employees of the Sheriff's Department more than once.
5. I have taught new hires and deputies in the Sheriff's Department from about 2008 through the spring of 2017.
6. I have not taught courtroom procedures to new deputies every year since 2008 because holding a new deputy class depends on whether a sufficient number of new deputies have been hired. I taught this class, as needed, from 2008 through the spring of 2017, after Sheriff Betts

was elected.

7. Even though Sheriff Bett's does not allow me to teach the new deputies anymore, my supervisors still use me to teach/train new hires in the Transportation Unit.

8. At the first all-staff roll call after Sheriff Betts was elected, he talked about racists in the Sheriff's Department. Sheriff Betts looked at me and said that all racists that are still here need to leave. While still looking at me, he then said, "don't f--k with me."

9. Before Sheriff Betts was elected sheriff, in my presence Deputy Antoine Cannon bragged that when Sheriff Betts was elected, he (Deputy Cannon) would be promoted.

10. I learned about Deputy Cannon's promotion to sergeant after it occurred, when I received a memo telling me I was being transferred from the Courts Unit to the Transportation/Jail Unit.

11. I did not request a transfer in April 2017 when I was transferred out of the Courts Unit. Sheriff Betts did not talk to me about moving me to another unit before I was moved.

12. No announcement was made that Sheriff Betts would be promoting a deputy to sergeant before the promotion of Deputy Cannon was made and deputies were not given the opportunity to apply for this promotion.

13. Sheriff Betts did not announce that he would be promoting deputies to sergeant before he promoted Felicia Davis and Tim Haill. I did not know these promotions had been made until after I filed my first lawsuit, which were disclosed as part of the lawsuit.

14. In January 2019, Sheriff Betts held an all-staff roll call. During this roll call, he talked about firing people whose attitudes he did not like. He walked up to me and looked at me when he said this. I felt he was trying to intimidate me.

15. In March 2019, Sheriff Betts announced during a roll call that if deputies wanted to

be considered for promotion, they should submit a letter, which I did.

16. During this same roll call (March 2019), Sheriff Betts talked about his "s--t list" and asked for a show of hands as to who knew how to get off of his s--t list. Several deputies raised their hands. Sheriff Betts told the rest of us that we should talk to the deputies that raised their hands if we wanted to know how to get off his s--t list. I did. Several deputies told me that the way to get off Sheriff Betts' s--t list was to give him money, which I understood to mean support his campaign.

17. When I see Sheriff Betts in the morning, I say hello to him. Sheriff Betts does not always return my greeting, but he is sometimes talking to other deputies in the courthouse.

FURTHER, Affiant sayeth naught.



John N. Castellano, III, Affiant

Sworn to and subscribed before me, a notary public, this 9<sup>th</sup> day of November, 2020.



Notary Public

MY COMMISSION EXPIRES:

